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January 8, 2024

VIA CM/ECF

The Honorable Claire C. Cecchi, U.S.D.J.
The Honorable Cathy L. Waldor
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: Almonte. v. The New Jersey Turnpike Authority, et als.
Civil Action No. 23-cv-22642

Dear Judge Waldor:

This office has been assigned to represent the State of New Jersey and The New Jersey Department of Transportation (collectively “State Defendants”) in the above-captioned matter. On December 19, 2023, the State Defendants’ clerk extension to file a responsive pleading was granted. *See* ECF No. 7. Presently, the State Defendants are in the process of obtaining certifications indicating the subject location of Plaintiff’s alleged incident is not state property. Due to this, the State Defendants respectfully request that their time to answer, move, or otherwise reply be extended for fourteen (14) days, or until January 23, 2024. Plaintiff’s counsel has kindly consented to this request.

If this approach is agreeable to the Court, it is respectfully requested that the Court enter a Text order that: sets January 23, 2024 as the deadline for the State Defendants’ responsive pleading.



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We thank Your Honor for your time and consideration of this matter.

Respectfully submitted,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Angela M. Cifelli
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Deputy Attorney General
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cc: All Counsel of Record (via CM/ECF)